



**Complaints Policy**

## MINT COMPLAINTS POLICY

Internal/External External (Public)

Policy Owner Legal, Risk and Compliance/Information Officer

Approved By EXCO

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### 1. PURPOSE AND OBJECTIVE

1.1. The purpose of this Complaints Policy ("**Policy**") is to establish a clear, transparent, fair, and effective framework for the receipt, handling, investigation, resolution, escalation, and reporting of complaints relating to MINT, its products, services, platforms, personnel, partners, and representatives (collectively, "**MINT**").

1.2. This Policy is designed to:

- 1.2.1. promote a culture of accountability, responsiveness, and continuous improvement;
- 1.2.2. ensure complaints are handled lawfully, fairly, timeously, and consistently;
- 1.2.3. protect the rights and legitimate interests of complainants and MINT;
- 1.2.4. comply with applicable South African laws, regulatory standards, and best-practice corporate governance principles; and
- 1.2.5. mitigate legal, regulatory, reputational, operational, and technology risks.

### 2. SCOPE OF APPLICATION

This Policy applies to:

- 2.1. all complaints received from clients, customers, users, counterparties, suppliers, service providers, employees, contractors, regulators, and other stakeholders;
- 2.2. all MINT business units, subsidiaries, affiliates, directors, officers, employees, consultants, and agents;
- 2.3. complaints relating to MINT's technology platforms, algorithms, data processing activities, commercial arrangements, billing, service delivery, conduct, or compliance matters.

### 3. DEFINITIONS

3.1. For purposes of this Policy:

- 3.1.1. "**Complaint**" means any expression of dissatisfaction, concern, grievance, or allegation, whether justified or not, relating to MINT's conduct, products, services, systems, decisions, or personnel, where a response or resolution is explicitly or implicitly expected;
- 3.1.2. "**Complainant**" means any person or entity who submits a complaint;
- 3.1.3. "**Material Complaint**" means a complaint that:
  - 3.1.3.1. alleges unlawful, unethical, fraudulent, discriminatory, or materially negligent conduct;
  - 3.1.3.2. involves potential regulatory non-compliance or systemic risk;
  - 3.1.3.3. exposes MINT to potential litigation, regulatory sanction, or material reputational harm; or
  - 3.1.3.4. involves significant financial exposure or data protection concerns;
- 3.1.4. "**Working Day**" means any day other than a Saturday, Sunday, or public holiday in the Republic of South Africa.

### 4. GUIDING PRINCIPLES

All complaints must be handled in accordance with the following principles:

- 4.1. Accessibility – complaint channels must be visible, easy to use, and available without unreasonable barriers.
- 4.2. Fairness and Impartiality – complaints must be assessed objectively, without bias or conflict of interest.

4.3. Confidentiality – information relating to complaints must be handled sensitively and disclosed strictly on a need-to-know basis.

4.4. Transparency – complainants must be informed of the process, timelines, and outcomes, subject to legal constraints.

4.5. Timeliness – complaints must be acknowledged, investigated, and resolved within reasonable and defined timeframes.

4.6. Proportionality – the level of investigation must be appropriate to the nature, complexity, and risk profile of the complaint.

4.7. Non-Retaliation – no person may be subjected to retaliation or adverse treatment for lodging a complaint in good faith.

## 5. COMPLAINT CHANNELS

5.1. MINT shall maintain multiple, accessible, and secure channels through which complaints may be lodged, in order to promote transparency, early issue identification, and effective risk management.

5.2. Subject to clause 5.6, complaints may be submitted through any of the following channels:

5.2.1. a dedicated complaints email address, monitored by the Risk function or such other designated function as MINT may determine from time to time;

5.2.2. a secure online complaint submission platform or web-based form, designed to ensure data integrity, confidentiality, and auditability;

5.2.3. written correspondence, whether delivered electronically or in hard copy, addressed to MINT at its registered office or principal place of business;

5.2.4. verbal complaints, whether made telephonically or in person, provided that:

5.2.4.1. such complaints shall, as soon as reasonably practicable, be accurately reduced to writing by an authorised MINT representative;

5.2.4.2. the written record shall, where feasible, be confirmed with the complainant for accuracy; and

5.2.4.3. the written record shall constitute the official complaint for purposes of investigation and record-keeping; and

5.2.5. internal escalation and reporting mechanisms, including whistleblowing or ethics reporting channels, where the nature of the complaint relates to alleged misconduct, unlawful activity, regulatory non-compliance, or other matters warranting protected disclosure.

5.3. MINT shall take reasonable steps to ensure that complaint channels are:

5.3.1. clearly communicated to stakeholders;

5.3.2. reasonably accessible without undue formality or cost; and

5.3.3. supported by appropriate internal procedures and trained personnel.

5.4. Complaints may be lodged by or on behalf of a complainant, provided that sufficient information is supplied to enable MINT to understand the nature and basis of the complaint.

5.5. Anonymous complaints may be accepted and investigated at MINT's discretion, provided that the information submitted is sufficiently detailed and credible to permit a meaningful assessment and investigation.

5.6. MINT reserves the right to request additional information where a complaint is incomplete, unclear, or incapable of investigation in its current form, provided that any such request shall not be used to unreasonably delay or frustrate the complaint-handling process.

5.7. The submission of a complaint through any channel shall not, in itself, limit or prejudice any statutory, contractual, or common-law rights that a complainant may have, subject always to applicable law.

## 6. RECEIPT AND ACKNOWLEDGEMENT

6.1. Upon receipt, every complaint must be promptly recorded in MINT's centralised Complaints Register, which shall constitute the official record for governance, risk

management, audit, and reporting purposes.

6.2. The Complaints Register must, at a minimum, record:

- 6.2.1. the date and method of receipt;
  - 6.2.2. the identity of the complainant (where disclosed);
  - 6.2.3. a summary of the complaint and the issues raised;
  - 6.3. 6.4. 6.5. 6.6. 6.2.4. the assigned reference number;
  - 6.2.5. the internal owner or function responsible for handling the complaint; and
  - 6.2.6. the status of the complaint and key milestones.
- Subject to clause 6.6, MINT shall acknowledge receipt of a complaint in writing within five (5) Working Days of receipt.

The written acknowledgement must, where reasonably practicable:

- 6.4.1. confirm receipt of the complaint;
  - 6.4.2. provide the complainant with a unique reference number for tracking purposes;
  - 6.4.3. outline the complaint-handling process, including the anticipated steps and indicative timeframes;
  - 6.4.4. identify the designated contact person, role, or function responsible for managing the complaint; and
  - 6.4.5. inform the complainant of any immediate information required to progress the matter.
- Where a complaint is received verbally, the written acknowledgement shall be issued once the complaint has been reduced to writing in accordance with this Policy. Where MINT is unable, for reasons beyond its reasonable control, to acknowledge receipt within the timeframe contemplated in clause 6.3, it shall:

- 6.6.1. record the reasons for such delay in the Complaints Register; and
- 6.6.2. issue the acknowledgement as soon as reasonably practicable thereafter.

6.7. The acknowledgement of receipt does not constitute an admission of liability, fault, or wrongdoing by MINT, and shall not prejudice MINT's rights or defences under applicable law.

## 7. INITIAL ASSESSMENT AND CLASSIFICATION

7.1. Every complaint recorded in the Complaints Register must, as soon as reasonably practicable after acknowledgement, undergo an initial assessment conducted by an appropriately authorised and suitably qualified person or function.

7.2. The purpose of the initial assessment is to:

7.2.1. determine whether the complaint falls within MINT's jurisdiction, mandate, and control, and whether it is relevant for handling under this Policy;

7.2.2. identify and classify the nature of the complaint, including (without limitation) whether it relates to:

- 7.2.2.1. service delivery or operational matters;
  - 7.2.2.2. contractual or commercial arrangements;
  - 7.2.2.3. technical, systems, platform, or algorithmic performance;
  - 7.2.2.4. conduct, ethics, or behavioural issues;
  - 7.2.2.5. data protection, confidentiality, or information security; or
  - 7.2.2.6. legal, regulatory, or compliance matters;
- 7.2.3. assess the materiality, severity, and risk profile of the complaint, having regard to:

- 7.2.3.1. potential financial exposure;
- 7.3. 7.4. 7.2.3.2. legal or regulatory implications;
- 7.2.3.3. reputational impact;
- 7.2.3.4. operational or systemic risk; and
- 7.2.3.5. potential impact on clients, users, or other stakeholders; and

7.2.4. identify any immediate remedial, containment, or risk-mitigation actions required to prevent ongoing harm, preserve evidence, or ensure regulatory compliance, including the imposition of interim controls or legal holds where appropriate.

Following the initial assessment, complaints must be categorised into one of the following classes for purposes of prioritisation, investigation, and escalation:

7.3.1. Low-Risk Operational Complaints – routine or isolated matters with limited impact and no material legal, regulatory, or reputational risk;

7.3.2. Standard Complaints – complaints requiring substantive investigation and resolution, but which do not meet the threshold for Material Complaints; or  
7.3.3. Material Complaints – complaints that, individually or collectively:

7.3.3.1. allege unlawful, unethical, fraudulent, discriminatory, or grossly negligent conduct;  
7.3.3.2. raise potential breaches of law, regulation, or internal policy;  
7.3.3.3. involve significant financial exposure, data compromise, or systemic failure; or  
7.3.3.4. pose a material risk to MINT's reputation, business continuity, or stakeholder trust.

The outcome of the initial assessment and classification must be:

7.4.1. recorded in the Complaints Register; and  
7.4.2. used to determine the appropriate investigation methodology, escalation level, and governance oversight applicable to the complaint.

7.5. The classification of a complaint may be reviewed and amended at any stage of the process if new information emerges or the risk profile changes.

## 8. INVESTIGATIVE PROCESS

8.1. Every complaint requiring investigation must be investigated by a suitably qualified, competent, and independent person or team, having regard to the nature, complexity, and risk profile of the complaint.

8.2. Independence for purposes of this clause requires that the investigator:

8.2.1. has no actual or perceived conflict of interest in relation to the subject matter of the complaint; and  
8.2.2. is not directly implicated in, or responsible for, the conduct or decision under investigation.

8.3. The scope and methodology of the investigation must be proportionate to the classification of the complaint and must be designed to ensure factual accuracy, fairness, and completeness.

8.4. Without limiting the generality of clause 8.3, an investigation may include one or more of the following steps, as appropriate:

8.4.1. the review and analysis of relevant documents, records, correspondence, contracts, policies, systems logs, and data sets;  
8.4.2. the conduct of interviews with the complainant (where appropriate), affected persons, witnesses, and relevant MINT personnel;

8.5. 8.6. 8.7. 8.4.3. consultation with, or referral to, internal specialists, including the legal, risk, compliance, information security, data protection, or technology functions;

8.4.4. forensic, technical, or data-driven analysis, including system audits, access reviews, or algorithmic assessments, where the complaint raises issues of fraud, data integrity, cybersecurity, or systemic failure; and

8.4.5. the imposition of interim measures, safeguards, or controls, where necessary to prevent ongoing harm, preserve evidence, or ensure regulatory compliance.

MINT may, at its discretion and where appropriate, appoint external independent advisors, including legal counsel, forensic investigators, auditors, or technical experts, particularly in relation to Material Complaints or matters involving heightened legal, regulatory, or reputational risk.

All investigations must be conducted:

8.6.1. in accordance with applicable law and regulatory requirements;  
8.6.2. ethically and in good faith;  
8.6.3. with due regard to procedural fairness and the rights of all affected parties;  
and  
8.6.4. in a manner that preserves confidentiality, legal privilege, and the integrity of the investigative process.

The findings, conclusions, and recommendations arising from an investigation must be:

8.7.1. appropriately documented;  
8.7.2. supported by evidence; and  
8.7.3. retained in accordance with MINT's records retention and legal hold obligations.

## 9. TIMEFRAMES

9.1. Subject to the nature, complexity, and classification of the complaint, MINT shall use reasonable endeavours to complete the investigation and communicate an outcome to the complainant within thirty (30) Working Days from the date of acknowledgement in accordance with this Policy.

9.2. The indicative timeframe contemplated in clause 9.1 does not constitute a fixed or guaranteed service level and may be extended where the complaint:

- 9.2.1. involves a Material Complaint;
- 9.2.2. requires complex factual, technical, forensic, or legal analysis;
- 9.2.3. depends on information, cooperation, or representations from third parties;
- 9.2.4. raises issues subject to regulatory, law-enforcement, or parallel internal processes; or
- 9.2.5. is otherwise incapable of resolution within the ordinary timeframe despite reasonable efforts.

9.3. Where MINT reasonably determines that a complaint cannot be resolved within the timeframe contemplated in clause 9.1, it shall, without undue delay:

- 9.3.1. notify the complainant in writing of the reasons for the delay, stated at an appropriate level of detail; and
- 9.3.2. provide an updated indicative timeframe for completion or, where this is not reasonably practicable, periodic progress updates at reasonable intervals.

9.4. Any extension of time and the reasons therefor must be recorded in the Complaints Register.

9.5. Nothing in this clause limits MINT's ability to take interim remedial, containment, or risk-mitigation actions prior to the finalisation of an investigation, where such actions are reasonably required.

## 10. OUTCOMES AND RESOLUTION

10.1. Upon completion of the investigation, MINT shall determine an appropriate outcome, having regard to the findings, the evidence available, the applicable legal and contractual framework, and the risk profile of the complaint.

10.2. Without limiting MINT's discretion, possible outcomes may include one or more of the following:

- 10.2.1. Acceptance of the complaint, in whole or in part, together with the implementation of appropriate remedial or corrective action;
- 10.2.2. Partial acceptance, where certain aspects of the complaint are substantiated and others are not, with reasons provided;
- 10.2.3. Rejection of the complaint, in whole or in part, where the complaint is not substantiated, accompanied by a clear explanation of the basis for such decision; or
- 10.2.4. Negotiated, alternative, or consensual resolution, including settlement, corrective undertakings, or other agreed measures, where this is appropriate and lawful.

10.3. Where a complaint is upheld, whether in whole or in part, remedial actions may include, as appropriate:

10.3.1. corrective service or operational measures designed to address the specific issue raised;

10.4. 10.5. 10.6. 10.7. 10.3.2. enhancements to systems, processes, platforms, algorithms, or controls to prevent recurrence;

10.3.3. refunds, credits, fee adjustments, or other financial remedies, where contractually, legally, or commercially appropriate;

10.3.4. disciplinary or corrective action in accordance with applicable employment, contractor, or governance frameworks; and

10.3.5. amendments to policies, procedures, training programmes, or governance arrangements.

The selected outcome and any remedial actions must be:

- 10.4.1. proportionate to the nature and severity of the complaint;
- 10.4.2. consistent with MINT's legal obligations and internal policies; and
- 10.4.3. approved at an appropriate level of authority, having regard to the classification of the complaint.

The outcome of the complaint, together with reasons, must be communicated to the complainant clearly and in writing, subject to:

- 10.5.1. applicable legal privilege;
- 10.5.2. confidentiality and data protection obligations; and
- 10.5.3. restrictions on the disclosure of internal disciplinary or third-party information.

The determination of an outcome under this clause does not constitute an admission of liability, fault, or wrongdoing by MINT, unless expressly stated otherwise. All outcomes and remedial actions must be documented and recorded in the Complaints Register, together with any follow-up actions and completion status.

#### Page 1311. **ESCALATION AND REVIEW**

11.1. A complainant who is dissatisfied with the outcome of a complaint may request that the matter be escalated for further review, subject to the procedures set out in this Policy.

11.2. An escalation request must, where reasonably practicable:

- 11.2.1. be submitted in writing;
- 11.2.2. set out the grounds on which the complainant remains dissatisfied; and
- 11.2.3. be lodged within a reasonable period following communication of the outcome.

11.3. Escalation under this Policy does not constitute a re-investigation as of right, but rather a review of:

- 11.3.1. whether the complaint was handled in accordance with this Policy;
- 11.3.2. whether the investigation process was fair and proportionate; and
- 11.3.3. whether the outcome was reasonable having regard to the information available at the time.

11.4. Depending on the nature, classification, and risk profile of the complaint, escalation may be directed to one or more of the following levels of authority:

- 11.4.1. senior management, where the complaint relates to operational or service delivery matters;
- 11.4.2. the Risk and Compliance function, where the complaint raises legal, regulatory, ethical, or control-related issues;
- 11.4.3. the Executive Committee, where the complaint involves cross-functional risk, material financial exposure, or reputational impact; or
- 11.4.4. the Board of Directors or a duly constituted Board Committee, where the complaint:

- 11.4.4.1. constitutes a Material Complaint;
- 11.4.4.2. involves senior management or executive-level conduct; or
- 11.4.4.3. presents material legal, regulatory, or strategic risk to MINT.

11.5. Material Complaints must be escalated without delay to the Legal, Risk and Compliance, irrespective of whether a complainant has requested escalation.

11.6. The outcome of any escalation or review must be documented, approved at the appropriate level of authority, and recorded in the Complaints Register.

11.7. The decision taken following escalation shall, subject to applicable law, constitute MINT's final internal position on the complaint.

11.8. Nothing in this clause limits a complainant's right to pursue external remedies, including referral to regulators, alternative dispute resolution bodies, or courts of competent jurisdiction.

#### **12. REGULATORY AND EXTERNAL REFERRALS**

12.1. Where required by law, regulation, contractual obligation, or where otherwise reasonably appropriate having regard to the nature and severity of a complaint, MINT may, subject to applicable legal constraints:

- 12.1.1. notify, engage with, or make disclosures to relevant regulators, supervisory authorities, or law enforcement agencies;
- 12.1.2. cooperate in good faith with external investigations, inquiries, inspections, or audits conducted by regulatory bodies, law enforcement authorities, or other competent authorities; and
- 12.1.3. take all reasonable steps to preserve relevant documents, records,

systems, and data in accordance with applicable legal hold, record-retention, and evidence-preservation obligations.

12.2. Any regulatory or external referral under clause 12.1 must be:

- 12.2.1. assessed and approved at an appropriate level of authority;
- 12.2.2. coordinated through the Legal, Risk and Compliance function; and
- 12.2.3. conducted in a manner that preserves confidentiality, legal privilege, and MINT's rights and defences.

12.3. Where a complaint gives rise to a reasonable prospect of litigation, regulatory enforcement, or formal investigation, MINT may implement enhanced controls, including:

- 12.3.1. issuing legal hold notices;
- 12.3.2. restricting internal and external communications; and
- 12.3.3. engaging external legal or forensic advisors.

12.4. Nothing in this Policy:

- 12.4.1. restricts or limits any person's right to refer a matter to an external dispute resolution body, regulator, ombud, or court of competent jurisdiction; or
- 12.4.2. obliges a complainant to exhaust internal complaint procedures before exercising any statutory or legal rights.

12.5. MINT's engagement with regulators or external bodies does not, in itself, constitute an admission of liability, fault, or wrongdoing, unless expressly stated otherwise.

### 13. RECORD-KEEPING AND REPORTING

13.1. MINT shall maintain complete, accurate, and up-to-date records of all complaints, investigations, outcomes, and related correspondence in a centralised and secure Complaints Register.

13.2. All complaints and related documentation must be:

- 13.2.1. retained in accordance with MINT's Records Retention Policy and applicable legal and regulatory requirements;
- 13.2.2. protected against unauthorised access, alteration, or destruction; and
- 13.2.3. preserved in accordance with any applicable legal hold or evidence-preservation obligations.

13.3. Complaint records must be sufficient to:

- 13.3.1. demonstrate compliance with this Policy;
- 13.3.2. support internal and external audit, regulatory review, or litigation processes; and
- 13.3.3. enable meaningful analysis of trends, root causes, and systemic risk.

13.4. Management shall receive periodic complaint-handling reports at intervals determined by the nature and risk profile of MINT's operations, which must, at a minimum, include:

- 13.4.1. the number, type, and classification of complaints received during the reporting period;
- 13.4.2. analysis of root causes, recurring themes, and emerging trends;
- 13.4.3. average and outlier resolution timeframes, including any material delays;
- 13.4.4. identification of systemic, structural, or control-related issues; and
- 13.4.5. remediation measures implemented or proposed, together with progress against such measures.

13.5. Where complaints data reveals material or systemic risk, such matters must be escalated to the appropriate governance forum, including senior management, the Executive Committee, or the Board or a Board Committee, as applicable.

13.6. Complaints data may be aggregated and anonymised for purposes of risk management, reporting, training, and continuous improvement, subject to applicable data protection and confidentiality obligations.

### 14. CONTINUOUS IMPROVEMENT

14.1. MINT shall treat complaints as a critical source of risk intelligence and continuous improvement, and shall implement processes to ensure that insights derived from complaints inform strategic, operational, and governance decision-making.

14.2. Without limiting the generality of clause 14.1, MINT shall:

14.2.1. systematically analyse complaint data, trends, and root causes to identify:

14.2.1.1. systemic, recurring, or emerging risks;  
14.2.1.2. weaknesses in products, services, platforms, algorithms, processes, or controls; and

14.2.2. gaps in training, communication, or governance arrangements;

14.3. use the insights derived from such analysis to:

14.3.1. implement targeted corrective and preventive actions;  
14.3.2. enhance products, services, systems, and technological solutions;  
14.3.3. strengthen internal controls, compliance frameworks, and risk management practices; and  
14.3.4. inform policy development, training programmes, and operational standards; and

14.4. review and, where necessary, update this Policy and related procedures to ensure ongoing alignment with:

14.4.1. applicable laws and regulatory requirements;  
14.4.2. evolving industry standards and best practice; and  
14.4.3. changes to MINT's business model, technology, and risk profile.

14.5. Where complaint trends indicate material or systemic risk, MINT shall ensure that such risks are:

14.5.1. appropriately escalated to senior management, the Executive Committee, or the Board or a Board Committee; and  
14.5.2. addressed through documented remediation plans with defined ownership, timelines, and accountability.

14.6. Continuous improvement initiatives arising from complaints must be monitored, tracked, and reviewed to assess effectiveness and sustainability.

## 15. TRAINING AND AWARENESS

15.1. MINT shall ensure that all personnel who are involved in, or may reasonably be expected to be involved in, the receipt, handling, investigation, escalation, or oversight of complaints receive appropriate, role-specific training.

15.2. Such training must be proportionate to the individual's responsibilities and must, at a minimum, cover:

15.2.1. obligations relating to the receipt, handling, investigation, and resolution of complaints in accordance with this Policy and applicable law;  
15.2.2. confidentiality, data protection, and information security requirements, including the duty to protect complainants from retaliation or adverse treatment for raising complaints in good faith;  
15.2.3. escalation pathways, decision-making thresholds, and governance structures applicable to different categories of complaints, including Material Complaints; and  
15.2.4. the consequences of non-compliance with this Policy, including disciplinary, regulatory, and reputational implications.

15.3. Training may take various forms, including induction programmes, periodic refresher sessions, targeted training for high-risk roles, and updates following material changes to law, regulation, or internal policy.

15.4. MINT shall maintain appropriate records of training undertaken for purposes of audit, compliance monitoring, and continuous improvement.

## 16. GOVERNANCE AND OVERSIGHT

16.1. This Policy is approved by the Board of Directors of MINT, which retains ultimate accountability for the effectiveness, adequacy, and oversight of the complaints management framework.

16.2. The Board may delegate aspects of oversight under this Policy to a duly constituted Board Committee, provided that such delegation does not dilute the Board's overall responsibility.

16.3. The Executive Committee is responsible for:

16.3.1. the implementation, administration, and day-to-day oversight of this Policy;

16.3.2. ensuring that appropriate procedures, controls, and resources are in place to support effective complaint handling;

16.3.3. monitoring compliance with this Policy and applicable legal and regulatory requirements; and

16.3.4. escalating Material Complaints, systemic issues, and material breaches of this Policy to the appropriate governance forum.

16.4. Compliance with this Policy forms an integral part of MINT's enterprise risk management framework, internal control environment, and governance processes.

16.5. Material non-compliance with this Policy may result in disciplinary action and may be escalated to senior management, the Executive Committee, or the Board, as appropriate.

#### 17. REVIEW

17.1. This Policy must be reviewed at least annually, and more frequently where required by:

17.1.1. changes in applicable law, regulation, or regulatory guidance;

17.1.2. material changes to MINT's business model, technology, or risk profile;

17.1.3. findings arising from complaints, audits, regulatory reviews, or incident investigations; or

17.1.4. identified deficiencies in the operation or effectiveness of this Policy.

17.2. Any material amendments to this Policy must be approved by the Board of Directors or such Board Committee as may be authorised.

17.3. The current version of this Policy must be made available to relevant stakeholders in a manner appropriate to their role and relationship with MINT.